

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THYMUS SHIPPING CORP.,	:	07 CV 10522 (LLS)
	:	
Plaintiff,	:	ECF CASE
	:	
- against -	:	

JANGHA MARINE CORP.,	:
	:
Defendant.	:
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NOTICE OF MOTION

Upon the annexed Memorandum of Law dated June 27, 2008, the Declaration of Kevin J. Lennon in Support thereof, and the pleadings and proceedings heretofore had herein, the Defendant, JANGHA MARINE CORP. hereby moves this Honorable Court at 500 Pearl Street, New York, NY pursuant to Supplemental Admiralty Rule E and Local Admiralty Rule E.1, on the 18th day of July 2008 at 2:00 p.m., or as soon thereafter as counsel may be heard, why an Order should not be entered requiring that Plaintiff, THYMUS SHIPPING CORP. ("THYMUS") post counter-security in favor of Defendant, JANGHA MARINE CORP. ("JANGHA"), in the amount of **\$322,760.66**, and that if THYMUS fails to provide such security within ten (10) business days of the date of the Order, that the Ex Parte Process of Maritime Attachment previously ordered in this case is vacated, and all of Defendant JANGHA's property and/or funds be released from attachment; or, in the alternative, require that THYMUS post counter-security in the same amount of funds belonging to JANGHA that it has restrained, and that if THYMUS fails to provide such security within ten (10) business days of the date of the Order, that the Ex-Parte Process of Maritime Attachment previously ordered in this case is vacated and

all of Defendant JANGHA's property and/or funds be released from attachment; and, that that this Court grant such other and further relief as the Court may deem just and proper.

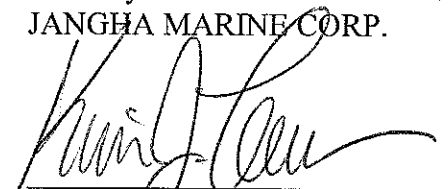
Opposition papers shall be filed and served on or before the 11th day of July, 2008 (Local Rule 6.1(b)(2));

Reply papers shall be filed and served on or before the 17th day of July, 2008 (Local Civil Rule 6.1(b)(3)).

Dated: June 27, 2008
Southport, CT

LENNON, MURPHY & LENNON, LLC
Attorneys for Defendant / Counterclaimant
JANGHA MARINE CORP.

By:


Kevin J. Lennon

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